Attorney Docket No. AUS920030523US1
Serial No. 10/617,526

II. REMARKS

A. Summary of the Response

Claims 8, 16, 23, 29, 37, 45, 52, and 58 were previously canceled.

Claims 1-7; 9-15; 17-22; 24-28; 30-36; 38-44; 46-51; and 53-57 were rejected in the

Final Office Action of May 16, 2007.

Claims 1, 9, 17, 24, 30, 38, 46, and 53 are amended

Claims 1-7; 9-15; 17-22; 24-28; 30-36; 38-44; 46-51; and 53-57 remain pending

B. Detailed Response

Applicants note with appreciation the Examiner's withdrawal of the prior rejections

under 35 USC §§ 101 and 112.

1. Double Patenting – Copending SN 10/617,530

Claims 1-58 are provisionally rejected on the ground of nonstatutory obviousness-type

double patenting as being unpatentable over claims 1-30 of copending Application No.

10/617,530, in view of

http://web.archive.org/web/20001204034200/http://www.mandarintools.com/, Chinese-English

Dictionary link. (hereafter "Mandarintools").

Response: Claims 8, 16, 23, 29, 37, 45, 52, and 58 were previously canceled. As shown

by the declarations and assignments on file in this and the co-pending application 10/617,530, as

well as by the signature of Applicant's attorney below, both the present application and the co-

pending application 10/617,530 are made by the same inventive entity (Chen and Dunsemoir).

The present application and the co-pending application 10/617,530 are also both owned by a

common assignor (International Business Machines Corporation). Even though the claims of

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application 10/617,530 have not issued, a provisional terminal disclaimer is not believed to be required. Copending application 10/617,530 was filed on July 10, 2003, the *same date* as the filing date of the present application. Therefore, there is no possibility of an extended term in this application.

2. Double Patenting – Copending SN 10/631,070

Claims 1-3, 8-11, 16-17, 23-24, 29-32, 37-40, 45-46, 52-53, and 58 are provisionally rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 1, 5-7, 26, and 30-32 of copending Application No. 10/631,070.

Response: Claims 8, 16, 23, 29, 37, 45, 52, and 58 were previously canceled.. As shown by the declarations and assignments on file in this and the co-pending application 10/631,070, as well as by the signature of Applicant's attorney below, both the present application and the co-pending application 10/631,070 are made by the same inventive entity (Chen and Dunsemoir). The present application and the co-pending application 10/6631,070 are also both owned by a common assignor (International Business Machines Corporation). Even though the claims of application 10/631,070 have not issued, a provisional terminal disclaimer is not believed to be required. Copending application 10/631,070 was filed on July 31, 2003, *after* the July 10, 2003 filing date of the present application. Therefore, there is no possibility of an extended term in this application. A Terminal Disclaimer has, however, been filed in the co-pending application 10/631,070.

3. 35 USC §103(a) Rejections

a) Claims 1-4, 6-7, 9-12, 14-15, 17-20, 22, 24-26, 28-33, 35-36, 38-41, 43-44, 46-49, 51, 53-55, and 57

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The examiner rejected claims 1-4, 6-7, 9-12, 14-15, 17-20, 22, 24-26, 28-33, 35-36, 38-41, 43-

44, 46-49, 51, 53-55, and 57 under 35 USC 103(a) as being unpatentable over Chinese-English

Dictionary

http://web.archive.org/web/20001204034200/http://www.mandarintools.com/ (hereinafter,

"Mandarintools") in view of Chinese-English Lookup

http://web.archive.org/web/20010309104519/http://home.iprimus.com.au/richwarm/cel/cel.htm

(hereinafter, "Lookup") and in further view of Foolsworkshop

(http://web.archive.org/web/20021206035901/http://www.foolsworkshop.com/ptou/)

(hereinafter, "Foolsworkshop").

    Response: Mandarintools, Lookup, and Foolsworkshop, alone or in combination, do not

teach or suggest all of the elements of any of Applicants' claims. It is well established that the

Examiner has the burden of proof to establish a *prima facie* case of obviousness under 35 U.S.C.

§103(a). MPEP 2142 states:

> To establish a *prima facie* case of obviousness, three basic criteria must be met.
> First, there must be some suggestion or motivation, either in the references
> themselves or in the knowledge generally available to one of ordinary skill in the
> art, to modify the reference or to combine reference teachings. Second, there must
> be a reasonable expectation of success. Finally, **the prior art reference (or
> references when combined) must teach or suggest all the claim limitations.**
> The teaching or suggestion to make the claimed combination and the reasonable
> expectation of success must both be found in the prior art, and not based on
> applicant's disclosure. [Emphasis added]

Each of the independent claims 1, 9, 17, 24, 30, 38, 45, and 53 has been amended to contain the

following element:

>   responsive to a user activation of a single control on the graphical user
> interface, simultaneously displaying the English word as a Traditional Chinese
> character, an unaccented Pin Yin word, and a hybrid Pin Yin word.

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PAGE 15/18 * RCVD AT 7/16/2007 7:00:00 PM [Eastern Daylight Time] * SVR:USPTO-EFXRF-3/2 * DNIS:2738300 * CSID:2144614053 * DURATION (mm-ss):04-54

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Mandarintools contains a reference to a Chinese/English look up dictionary, but the example given of this dictionary does not teach or suggest Applicants' simultaneous display all four forms of the Chinese word in response to a single control on a graphical user interface.

The search template example given in Mandarintools will translate any of the four forms of a word into only Traditional Chinese or Simplified Chinese, but not both at the same time. Multiple translations are possible, but only in response to multiple search queries. (See search template at the top of the page of Mandarintools). The limited functionality is confirmed by the alternate TigerNT and G.Q. Shen "mirror sites" disclosed on page 1 of Mandarintools. These "mirror sites" make it clear that only one form of the Chinese word will be displayed at a time in response to a search request. Multiple search queries are required to separately display all four forms of the word.

"Lookup" does not cure the deficiency of Mandarintools. Lookup is a Chinese English lookup utility that reads a Chinese character from the Windows clipboard and automatically displays the corresponding entries contained in a public domain Chinese/English dictionary. Mandrintools does not have a graphical user interface, and it does not simultaneously display all four forms of a Chinese word. According to the Lookup documentation (CEL2DOC.TXT), multiple copies of the programs must be installed in parallel directories to decode different versions of Chinese (Big5 and GB are mentioned). Lookup also does not use Unicode to decode multiple forms of a Chinese word.

The additional reference, "Foolsworkshop," does not cure the deficiencies of Mandarintools and Lookup. According to Foolsworkshop:

> This page performs a simple function. It converts text written in pinyin, with syllable-final tone numbers, into unicode. The result is displayed both as plain unicode text and as the HTML code necessary to display the unicode in a web page.

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In other words, Foolsworkshop is not a translator. It merely converts one form of the Pinyin

word into a Unicode version of the Pinyin word. All of the independent claims recite the

simultaneous display *four forms* of a Chinese word – Traditional Chinese, Simplified Chinese,

Pinyin and English – on a graphical user interface in response to a single user command.

Foolsworkshop, alone or in combination with Mandarintools and Lookup, does not teach or

suggest Applicants' functionality. All of the remaining claims are dependent on one of the

independent claims discussed above and contain all of the elements thereof. Accordingly,

Applicants respectfully submit that all of the pending claims are in a condition for allowance.

4. Dependent claims 5, 13, 21, 27, 34, 42, 50 and 56

The examiner rejected claims 5, 13, 21, 27, 34, 42, 50 and 56 under 35 USC 103(a) as

being unpatentable over Mandarintools in view of Foolsworkshop and in further view of

Hughes ("11CT3 Computer Science Sampler Paper 1", 1998, University of Dublin).

Response: All of these claims are dependent on the independent claims discussed above.

They contain all of the elements of those independent claims and are allowable for the same

reasons. Accordingly, dependent claims 5, 13, 21, 27, 34, 42, 50 and 56 are also in a condition

for allowance.

III. CONCLUSION

Applicants respectfully submits that claims 1-7; 9-15; 17-22; 24-28; 30-36; 38-44;

46-51; and 53-57 are all in a condition for allowance. In the event that the Examiner

believes that additional rejections are in order, the Applicants respectfully request that the

above amendments be entered in order to reduce the issues on appeal. If the Examiner

has any questions or concerns regarding the present claims, the undersigned requests the

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scheduling of a telephone interview to discuss this case in greater depth.   The Applicants

counsel may be reached at the telephone number given below.

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Respectfully submitted,

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